

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Richmond Division

UNITED STATES OF AMERICA,)	Criminal No. 3:14CR <u>057</u>
)	
v.)	18 U.S.C. §§ 2251(a)
)	Production of Child Pornography
CAMERON SCOT BIVINS-BREEDEN,)	(Count 1)
)	
<i>Defendant.</i>)	18 U.S.C. § 2422(b)
)	Enticement of a Minor
)	(Count 2)
)	
)	18 U.S.C. § 2253
)	Forfeiture Notice

INDICTMENT

April 2014 Term — At Richmond, Virginia.

THE GRAND JURY CHARGES THAT:

COUNT ONE

(Production of Child Pornography)

On or about February 16, 2014, in the Eastern District of Virginia and within the jurisdiction of this Court, the defendant, CAMERON SCOT BIVINS-BREEDEN, employed, used, persuaded, induced, enticed, and coerced a minor to engage in, any sexually explicit conduct for the purpose of producing any visual depiction of such conduct knowing and having reason to know that such visual depiction was produced using materials that had been mailed, shipped and transported in or affecting interstate and foreign commerce by any means, including by computer, to wit: one (1) image labeled "1743619_625386777526713_486945734_n.jpg."

(In violation of Title 18, United States Code, Sections 2251(a)).

COUNT TWO

(Enticement of a Minor Using a Facility or Means of Interstate Commerce)

Between on or about February 12, 2014, and on or about February 22, 2014, the defendant, CAMERON SCOT BIVINS-BREEDEN, did use facilities and means of interstate commerce, *i.e.*, the Internet and cellular telephones, to knowingly persuade, induce, and entice an individual who he believed to be 12 years old, to engage in any sexual activity for which any person can be charged with a criminal offense, *i.e.*, production of child pornography, as that offense is defined under Title 18, United States Code, Section 2251(a).

(In violation of Title 18, United States Code, Section 2422(b).)

FORFEITURE NOTICE

Pursuant to Rule 32.2(a) FED. R. CRIM. P., the defendant is hereby notified that, if convicted of any of the above Counts One through Two, the United States will seek forfeiture of the defendant's interest in any visual depiction produced, transported, mailed, shipped or received in violation of Title 18, United States Code, Sections 2251 *et seq.*, and any property, real or personal, constituting or traceable to gross profits or other proceeds or used or intended to be used to commit or promote the commission of such offense(s), including, but not limited to the following:

One (1) iPhone 4 cellular telephone, serial number C8QGGI4XDDP7;


One (1) iPhone 5(c) cellular telephone, serial number 357990056798664

(In accordance with Title 18, United States Code, Section 2253).

A TRUE BILL:

Pursuant to the E-Government Act,
the original of this page has been filed
under seal in the Clerk's Office

DANA J. BOENTE
ACTING UNITED STATES ATTORNEY


Erik S. Siebert
Assistant United States Attorney

FOREPERSON